

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SUNG EIK HONG,

Plaintiff,

v.

QUEST INTERNATIONAL LIMOUSINE,
INC.,

Defendant.

21-CV-07908 (AT)(SN)

rel. 19-CV-04436 (SN)

**NOTICE OF MOTION AND MOTION
TO DISMISS**

PLEASE TAKE NOTICE that on the 2nd day of December, 2021 at 9:30 a.m., or as soon thereafter as counsel can be heard by the above-entitled court, will and hereby do respectfully move this Court pursuant to Federal Rule of Civil Procedure 12(b)(6) for dismissal of the Complaint in favor of Defendant and against Plaintiff.

This motion is made on the grounds that the Complaint fails to state a claim upon which relief can be granted.

This motion is based on this Notice of Motion and Motion, the concurrently-filed Memorandum in Support of Motion, the Declaration of Errol C. Deans, Jr. in Support of the Motion, the Proposed Order, the pleadings and papers on file in this action, and on such other and further evidence as may be presented prior to, and at, the hearing on this motion.

DATED: November 5, 2021
Fort Lee, New Jersey

SONG LAW FIRM, LLC

BY: /s/ Errol C. Deans, Jr.
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